

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

**RE: MICHAEL W. MONAGHAN, JR., DEBTOR CASE NO. 16-10941-JDW
CHAPTER 13 BK**

NOTICE OF MOTION TO MODIFY CONFIRMED PLAN

Should any party receiving this notice respond or object to said motion, such response or objection is required to be filed on or before January 2, 2020, with the Clerk of this Court using the CM/ECF system at the following address:

Shallanda Clay, Clerk of Court
U. S. Bankruptcy Court
Northern District of Mississippi
703 Hwy. 145 North
Aberdeen, MS 39730

and a copy must be served on the undersigned Debtor(s)' attorney. If no responses are filed, the Court may consider said motion immediately after the time has expired. In the event a written response is filed, the Court will notify you of the date, time and place of the hearing thereon.

CERTIFICATE OF SERVICE

I, James W. Amos, counsel for the Debtor(s), do hereby certify that I have electronically filed the foregoing with the Clerk of Court using the CM/ECF system, and I hereby certify that I either mailed by United States Postal Service, first class, postage prepaid, or electronically notified through the CM/ECF system, a copy of the above and foregoing to the creditors listed on the attached mailing matrix and to the following attorneys of record and/or parties of interest.

- 1) Locke D. Barkley
sbeasley@barkley13.com
- 2) U. S. Trustee
USTPRegion05.AB.ECF@usdoj.gov
- 3) Michael W. Monaghan, Jr.
4081 Jordan Creek Drive
Hernando, MS 38632

Dated this 2nd day of December, 2019.

/s/ James W. Amos

James W. Amos, MSB No. 1559

Attorney for Debtor

2430 Caffey St.

Hernando, MS 38632

Phone 662-429-7873

jwamosattorney@aol.com

Label Matrix for local noticing
0537-1
Case 16-10941-JDW
Northern District of Mississippi
Aberdeen
Mon Dec 2 11:24:10 CST 2019

BP
Cardmember Services
P.O. Box 15298
Wilmington, DE 19850-5298

Locke D. Barkley
6360 I-55 North
Suite 140
Jackson, MS 39211-2038

Capital One Bank
P.O. Box 60599
City of Industry, CA 91716-0599

Chase Home Mortgage
P. O. Box 9001871
Louisville, KY 40290-1871

Fidelity Bank
King & Spencer PLLC
c/o Larry Spencer, Esq.
P.O. Box 123
Jackson, MS 39205-0123

First National Bank of Omaha
1620 Dodge Street, Stop code 3105
Omaha, NE 68197-0002

Home Depot Credit Services
P.O. Box 790328
Saint Louis, MO 63179-0328

Internal Revenue Service
P. O. Box 7346
Philadelphia PA 19101-7346

JPMorgan Chase Bank, National Association
Chase Records Center
Attn: Correspondence Mail
Mail Code LA4-5555
700 Kansas Lane
Monroe, LA 71203-4774

James W. Amos
2430 Caffey Street
Hernando, MS 38632-1798

Baptist Medical Group
c/o Accounts Receivable Management Servi
P.O. Box 638
Paris, TN 38242-0638

Capital One
P.O. Box 30285
Salt Lake City, UT 84130-0285

Capital One Bank (USA), N.A.
PO Box 71083
Charlotte, NC 28272-1083

Credit One Bank
P.O. Box 98873
Las Vegas, NV 89193-8873

Fidelity Bank
P. O. Box 105690
Atlanta, GA 30348-5690

First State Finance
448 Hwy 51 North
Covington, TN 38019-2363

(p)INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY OPERATIONS
PO BOX 7346
PHILADELPHIA PA 19101-7346

JP Morgan Chase Bank
1080 River Oaks Drive
Ste B-202
Flowood, MS 39232-7603

Charles H. Keeton
115 Builders Square Drive
Brandon, MS 39047-4623

BMH - DeSoto
c/o Accounts Receivable Management Svc
P.O. Box 638
Paris, TN 38242-0638

Baptist Memorial Hospital
P.O. Box 415000
MSV-410376
Nashville, TN 37241-5000

Capital One
P.O. Box 60599
City of Industry, CA 91716-0599

Carmen J. Carter
Attorney at Law
214 West Walnut St.
Butler, MO 64083-8800

Department of Revenue
P.O. Box 3000
Tupelo, MS 38803-3000

First Bankcard
P.O. Box 2557
Omaha, NE 68103-2557

Hernando Family Medical Clinic
P.O. Box 1015
Hernando, MS 38632-5015

Internal Revenue Service
In care of U.S. Attorney
900 Jefferson Avenue
Oxford MS 38655-3608

JPMorgan Chase Bank
C/O Shapiro and Massey LLC
1080 River Oaks Drive
Suite B-202
Flowood, MS 39232-7603

LVNV Funding, LLC its successors and assigns
assignee of FNBM, LLC
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

LVNV Funding, LLC its successors and assigns
assignee of LendingClub Corporation &
LC Trust I
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

LVNV Funding, LLC its successors and assigns
PO Box 10587
Greenville, SC 29603-0587

Lenders Credit Union
214 Oil Well Road
Jackson, TN 38305-7914

Lowe's/Synchrony Bank
P.O. Box 965004
Orlando, FL 32896-5004

MSK Group
P.O. Box 34605
Memphis, TN 38184-0605

J. Gary Massey
Shapiro & Brown, LLC
1080 River Oaks Drive
Suite B-202
Flowood, MS 39232-7603

Medical Financial Services
6555 Quince Rd., Suite 301
Memphis, TN 38119-8220

Midland Funding LLC
PO Box 2011
Warren, MI 48090-2011

Mississippi Department of Revenue
Bankruptcy Section
Post Office Box 22808
Jackson, MS 39225-2808

Michael W. Monaghan Jr.
4081 Jordan Creek Drive
Hernando, MS 38632-6313

Orion Federal Credit Union
7845 Hwy 64
Memphis, TN 38133-4007

(p)PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

REGIONS BANK
P O BOX 10063
BIRMINGHAM AL 35202-0063

Recovery Management Systems Corporation
25 SE 2nd Ave, Suite 1120
Miami, FL 33131-1605

Regions
Consumer Loan Processing
P.O. Box 2224
Birmingham, AL 35246-0026

Roger Irvin, Attorney at Law
P.O. Box 426
Butler, MO 64730-0426

Sam's Club/Synchrony Bank
P.O. Box 530942
Atlanta, GA 30353-0942

Smith Well Drilling & Svcs
P.O. Box 413
Coldwater, MS 38618-0413

Larry Spencer
King & Spencer
235 E. Capitol St.
P.O. Box 123
Jackson, MS 39205-0123

Synchrony Bank
Attn: Bankruptcy Dept.
P.O. Box 965060
Orlando, FL 32896-5060

Synchrony Bank
c/o Recovery Management Systems Corp
25 SE 2nd Avenue, Suite 1120
Miami, FL 33131-1605

Synchrony Bank
c/o Recovery Management Systems Corporat
25 S.E. 2nd Avenue, Suite 1120
Miami, FL 33131-1605

Synchrony Bank - Care Credit
P.O. Box 960061
Orlando, FL 32896-0061

Synchrony Bank/JCPenney
P.O. Box 960090
Orlando, FL 32896-0090

Timberhills Region IV-MS
P.O. Box 839
Corinth, MS 38835-0839

U. S. Trustee
501 East Court Street, Suite 6-430
Jackson, MS 39201-5022

(p)US BANK
PO BOX 5229
CINCINNATI OH 45201-5229

Walmart/Synchrony Bank
P.O. Box 530927
Atlanta, GA 30353-0927

Webbank
c/o Vital Recovery Services, LLC
P.O. Box 923748
Norcross, GA 30010-3748

Wells Fargo Bank, N.A., dba Wells Fargo Deal
PO Box 19657
Irvine, CA 92623-9657

Wells Fargo Dealer Services
P.O. Box 17900
Denver, CO 80217-0900

Wells fargo Dealer Services
1451 Thomas Langston Road
Winterville, NC 28590-8872

Zales Credit Plan
P.O. Box 6403
Sioux Falls, SD 57117-6403

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Internal Revenue Service
Attn: Special Processing Staff
100 West Capitol Street
Room 504
Jackson MS 39269

(d)Internal Revenue Service
P. O. Box 21126
Philadelphia, PA 19114-0328

Portfolio Recovery Associates, LLC
POB 41067
Norfolk VA 23541

US Bank
P.O. Box 108
Saint Louis, MO 63166

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Fidelity Bank
King & Spencer PLLC
c/o Larry Spencer, Esq.
P.O. Box 123
Jackson, MS 39205-0123

(u)JPMorgan Chase Bank NA

(d)Mississippi Department of Revenue
Bankruptcy Section
Post Office Box 22808
Jackson MS 39225-2808

End of Label Matrix
Mailable recipients 62
Bypassed recipients 3
Total 65

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI

RE: MICHAEL W. MONAGHAN, JR., DEBTOR CASE NO. 16-10941-JDW
CHAPTER 13 BK

MOTION TO MODIFY CHAPTER 13 PLAN

COMES NOW, Debtor, Michael W. Monaghan, by and through his attorney, James W. Amos, and files this motion to modify her Chapter 13 Plan and would show unto the Court as follows:

1. Debtor's leg was seriously injured on the job on August 6th, 2019 and he has not been able to work since. He will have to have surgery again for his injury within the next month which will cause him to not be able to work for at least the next three months.

2. Because of the financial hardship that this injury has caused, Debtor proposes to modify his plan by paying only his secured creditors until he is able to work again with the hope that this will decrease his monthly plan payment amount. Debtor estimates that he will not be able to go back to work performing light duty until at least March 2020.

WHEREFORE, Debtor prays that the Court will allow his Chapter 13 plan to be modified as stated above and that the Chapter 13 Trustee will adjust his monthly plan payments accordingly.

Dated this 2nd day of December, 2019.

Respectfully submitted,

/s/ James W. Amos

JAMES W. AMOS MSB #1559
ATTORNEY FOR DEBTOR
2430 CAFFEY ST.
HERNANDO, MS 38632
PHONE: 662-429-7873

CERTIFICATE OF SERVICE

I hereby certify that I have this day mailed by U.S. Mail, postage prepaid, and/or via ECF, a true and correct copy of the above and foregoing MOTION TO MODIFY CHAPTER 13 PLAN to the creditors listed on the attached mailing matrix and to the following:

- 1) Locke D. Barkley
sbeasley@barkley13.com
- 2) U. S. Trustee
USTPRegion05.AB.ECF@usdoj.gov
- 3) Michael W. Monaghan, Jr.
4081 Jordan Creek Drive
Hernando, MS 38632

This the 2nd day of December, 2019.

/s/ James W. Amos
JAMES W. AMOS